



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

VIA ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Jason Wehrli, Owner
Wehrli Custom Fabrication, Inc.
Wehrli Custom Machining Inc.
jason@wcfab.com

Re: Finding of Violation for Clean Air Act Violations
Wehrli Custom Fabrication, Inc., Wehrli Custom Machining, Inc., Dekalb, Illinois

Dear Mr. Wehrli:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Wehrli Custom Fabrication, Inc. (WC Fab) and Wehrli Custom Machining (WC Machining) (collectively, "Wehrli") for violating Sections 203(a)(3)(A) and (B) of the Clean Air Act (CAA), 42 U.S.C. §§ 7522(a)(3)(A) and (B). As summarized in the attached FOV, EPA has determined that Wehrli has removed and/or rendered inoperative devices or elements of design installed on or in motor vehicles or motor vehicle engines, and Wehrli has manufactured, sold, offered to sell, and installed parts or components that bypass, defeat, or render inoperative elements of design of those engines that were installed by the original equipment manufacturer in order to comply with CAA emission standards.

We are offering Wehrli an opportunity to confer with us about the violations alleged in the FOV. The conference will give Wehrli an opportunity to present information on the specific findings of violation, any efforts Wehrli have taken to comply and the steps Wehrli will take to prevent future violations. In addition, in order to make the conference more productive, we encourage Wehrli to submit to us information responsive to the FOV prior to the conference date.

Please plan for Wehrli technical and management personnel to attend the conference to discuss compliance measures and commitments. Wehrli may have an attorney represent Wehrli at this conference.

The EPA contact in this matter is Sarah Clark. You may contact her at (312) 886-9733 or at clark.sarah@epa.gov to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

**NATHAN
FRANK**

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NATHAN FRANK
Date: 2021.09.26
22:25:00 -05'00'

Nathan Frank

Chief, Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure: SBREFA fact sheet

cc: Kent Mohr, Manager
Compliance Section
Bureau of Air
Illinois Environmental Protection Agency
Kent.Mohr@Illinois.gov

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Wehrli Custom Fabrication, Inc.
Wehrli Custom Machining, Inc.
DeKalb, Illinois

Proceedings Pursuant to
The Clean Air Act,
42 U.S.C. §§ 7521-7554

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FINDING OF VIOLATION

EPA-5-21-MOB-19

FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Finding of Violation to Wehrli Custom Fabrication, Inc. (WC Fab) and Wehrli Custom Machining (WC Machining), (“WC Fab,” “WC Machining” or “Respondents”) for violating Sections 203(a)(3)(A) and (B) of the Clean Air Act (CAA), 42 U.S.C. § 7522(a)(3)(A) and (B).

Statutory and Regulatory Background

1. Congress’s purpose in enacting the CAA included “to protect and enhance the quality of the Nation’s air resources so as to promote the public health and welfare and the productive capacity of its population,” and “to initiate and accelerate a national research and development program to achieve the prevention and control of air pollution.” 42 U.S.C. § 7401(b)(1) – (2).
2. In enacting the CAA, Congress found, in part, that “the increasing use of motor vehicles...has resulted in mounting dangers to the public health and welfare.” 42 U.S.C. § 7401(a)(2). Thus, Congress enacted Title II of the CAA, 42 U.S.C. § 7521 *et seq.*, to protect public health and the environment by reducing emissions of nitrogen oxides (NO_x), particulate matter (PM), and other pollutants from mobile sources of air pollution, including “motor vehicles.”
3. Section 216(2) of the CAA defines “motor vehicle” as “any self-propelled vehicle designed for transporting persons or property on a street or highway.” 42 U.S.C. § 7550(2). *See also* 40 C.F.R. § 85.1703 (further defining “motor vehicle”).
4. Pursuant to Section 202 of the CAA, 42 U.S.C. § 7521, EPA promulgated emission standards for PM, NO_x, and other pollutants applicable to motor vehicles and motor vehicle engines, including diesel engine vehicles. *See generally* 40 C.F.R. Part 86.

5. Diesel engine manufacturers employ many devices and elements of design to meet applicable emission standards in 40 C.F.R. Part 86.¹ “Element of design” is defined as “any control system (i.e., computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle or motor vehicle engine.” 40 C.F.R. § 86.094-2.² *See also* 40 C.F.R. § 86.1803-01.
6. Section 203(a)(1) of the CAA, 42 U.S.C. § 7522(a)(1), prohibits a manufacturer of motor vehicles or motor vehicle engines from selling a new motor vehicle or motor vehicle engine in the United States unless the motor vehicle or motor vehicle engine is covered by a certificate of conformity (COC). EPA issues COCs to motor vehicle and motor vehicle engine manufacturers under Section 206(a) of the CAA, 42 U.S.C. § 7525(a), to certify that a particular group of motor vehicles and motor vehicle engines conform to applicable EPA requirements governing motor vehicle emissions. The COC will include, among other things, a description of the diesel engines, their emission control systems, all auxiliary emission control devices and the engine parameters monitored.
7. Section 203(a)(3)(A) of the CAA, 42 U.S.C. § 7522(a)(3)(A), makes it unlawful for “any person to remove or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter [Title II of the CAA], prior to its sale and delivery to the ultimate purchaser, or for any person knowingly to remove or render inoperative any such device or element of design after such sale and delivery to the ultimate purchaser.”
8. Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B), makes it unlawful for “any person to manufacture or sell, or offer to sell, or install, any part or component intended for use with, or as part of, any motor vehicle or motor vehicle engine, where a principal effect of the part or component is to bypass, defeat, or render inoperative any device or element of design installed on or in a motor vehicle or motor vehicle engine in compliance with regulations under this subchapter [Title II of the CAA], and where the person knows or should know that such part or component is being offered for sale or installed for such use or put to such use.”

¹ To meet the emission standards in 40 C.F.R. Part 86 and qualify for a certificate of conformity, diesel engine manufacturers may utilize control devices or elements of design such as Exhaust Gas Recirculation (EGR) and throttle valve assembly, Crankcase Ventilation (CV), Diesel Oxidation Catalyst (DOC), Diesel Particulate Filter (DPF), and/or Selective Catalytic Reduction (SCR) systems. Diesel engine vehicle manufacturers may also employ engine fueling strategies (such as retarded fuel injection timing) as a primary element of design to limit NO_x emissions. *See* 59 Fed. Reg. 23,264 at 23,418 (May 5, 1994) (“[I]njection timing has a very significant impact on NO_x emission rates, with advanced timing settings being associated with higher NO_x...”). Modern diesel engine vehicles are equipped with electronic control modules (ECMs). ECMs continuously monitor engine and other operating parameters and control the emission control devices and elements of design, such as the EGR, DOC, DPF, and SCR, and CV systems, in addition to the engine fueling strategy.

² Pursuant to Section 202(m) of the CAA, 42 U.S.C. § 7521(m), EPA promulgated regulations for motor vehicles manufactured after 2007 requiring diesel engine motor vehicles to have numerous devices or elements of design that working together can detect problems with the emission-related systems of the vehicle, alert drivers to these problems, and store electronically-generated malfunction information. *See* 40 C.F.R. §§ 86.005-17, 86.007-17, 86.1806-05. These devices or elements of design are referred to as “onboard diagnostic systems” (OBD Systems).

9. The CAA does not exempt “off-road use only” or “competition only” motor vehicles or motor vehicle engines. The definitions for motor vehicle at Section 216(2) of the CAA, 42 U.S.C. § 7550(2) and 40 C.F.R. § 85.1703 make no exemption for motor vehicles or motor vehicle engines used for competition.³ In addition, these definitions are based on vehicle attributes (*e.g.*, ability to travel over 25 miles per hour, lack of features that render street use unsafe) and make no exemption for vehicles based on their use.
10. Section 302(e) of the CAA, 42 U.S.C. § 7602(e), defines “person” to include individuals, corporations, partnerships, and associations.

Background

11. WC Fab and WC Machining are located at 300 Harvestore Drive, DeKalb, Illinois, 60115 (Facility).
12. Jason Wehrli is the owner of WC Fab and WC Machining.
13. WC Fab manufactures, sells, and installs aftermarket parts for use with diesel-powered motor vehicles and operates a performance and repair shop.
14. WC Machining machines, from raw materials, many different components which are sold to WC Fab and used in the process of building aftermarket parts for use with diesel-powered motor vehicles.
15. The aftermarket parts manufactured by Wehrli are intended for use with, or as part of, diesel-engine pick-up trucks, including, but not limited to, 2003-2018 model year (MY) Dodge Ram with 6.7L Cummins engines, 2003-2018 MY Ford Powerstroke with 6.7L Powerstroke engines, and 2007.5-2010 MY GM Silverado/Sierra with 6.6L Duramax engines (LLY/LBZ, LMM, and LML).
16. On February 24, 2020, EPA representatives performed an inspection (Inspection) of the Facility to evaluate the WC Machining and WC Fab’s compliance with Title II (Mobile Source Provisions) of the CAA. During the inspection, EPA inspectors interviewed Mr. Wehrli.
17. On August 4, 2020, EPA issued a request for information to WC Fab, WC Machining, and Mr. Wehrli pursuant to Section 208 of the CAA, 42 U.S.C. § 7542 (Request). The Request sought information related to Respondents’ manufacture, purchase, sale, and installation of parts and components and services which bypass, defeat, or render

³ In contrast, the CAA exempts from the definition of “nonroad vehicle” and “nonroad engine” those vehicles and engines used solely for competition. Section 216(10)-(11) of the CAA; 42 U.S.C. § 7550(10)-(11). EPA has implemented regulations describing how to exempt from CAA requirements nonroad vehicles and engines used solely for competition. 40 C.F.R. § 1068.235. These regulations explicitly do not apply to motor vehicles and motor vehicle engines. 40 C.F.R. § 85.1701(a)(1).

inoperative any emission control component, element of design, or emissions related part or component for the period from January 1, 2018 to the date of receipt of the Request.

18. Between October 20, 2020 and April 21, 2021, EPA received Respondents' responses to EPA's Request, including purchase orders, sales invoices, and spreadsheets.
19. Based on the information provided, from at least January 2, 2018 to May 15, 2020, Respondents manufactured, sold, and/or installed EGR block plates, exhaust systems, ECM tunes or tuners, and other engine components, including but not limited to the parts and components identified in Appendix A.

Violations

20. WC Fab is a corporation, and is a "person," as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
21. WC Machining is a corporation, and is a "person," as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
22. From at least January 2, 2018 to May 15, 2020, Respondents manufactured, sold, offered for sale, and/or installed at least 1,455 aftermarket automotive parts or components that disable, remove, bypass, defeat, or render inoperative air pollution emission control systems installed on or in motor vehicles and motor vehicle engines in compliance with the Mobile Source Provisions of the CAA (Defeat Devices), including but not limited to the parts and components identified in Appendix A.
23. Of the 1,455 Defeat Devices that Respondents manufactured, sold, offered for sale, and/or installed, at least:
 - a. 1,006 remove or bypass the EGR system, can only operate with the EGR system removed, and/or remove the throttle valve assembly, resulting in disabling of the EGR system (EGR Delete Hardware);
 - b. 243 remove or bypass the CV system by replacing the stock crankcase emission control equipment with parts that reroute crankcase gases to the atmosphere instead of back to the intake (CV Delete Hardware);
 - c. 89 consist of exhaust systems that remove or bypass one or more aftertreatment emission control devices, such as the DOC, DPF, and/or SCR systems (Aftertreatment Delete Hardware); and
 - d. 117 were aftermarket tunes or tuners where a principal effect of the tune or tuner was to bypass, defeat, render inoperative, or allow for the removal of one or more emission control devices or elements of design installed on or in a motor vehicle or motor vehicle engine, such as the EGR, DOC, DPF, SCR, and/or OBD systems or engine fueling strategy, without illuminating a malfunction indicator lamp (MIL) in the vehicle's OBD system, prompting any diagnostic trouble code

(DTC) in the OBD system, or causing any engine derating due to the removal or disabling of the emission control device (Defeat Tunes).

24. From at least January 2, 2018 to May 15, 2020, WC Fab tampered with at least 101 motor vehicles equipped with heavy-duty diesel engines by removing or rendering inoperative, via the installation of Defeat Devices, the EGR, CV, DOC, DPF, SCR, and/or OBD systems and emissions-related elements of the ECM installed in compliance with Mobile Source Provisions of the CAA.
25. The parts and components manufactured, sold, offered for sale, and/or installed by Respondents were intended for “motor vehicles” as defined by Section 216(2) of the CAA, 42 U.S.C. § 7550(2) and were designed for use on makes and models of diesel-engine motor vehicles for which their respective manufacturers have obtained COCs establishing compliance with CAA emissions standards.
26. Respondents knew or should have known that these parts and/or components were being used to bypass, defeat, or render inoperative the emission controls on motor vehicles and/or motor vehicle engines certified under the CAA.
27. From at least January 1, 2018 to May 15, 2020, Respondents violated Section 203(a)(3)(A) of the CAA, 42 U.S.C. § 7522(a)(3)(A) by knowingly removing and/or rendering inoperative emissions-related elements of the ECM installed on or in motor vehicles or motor vehicle engines that were in compliance with Title II of the CAA.
28. From at least January 2, 2018 to May 15, 2020, Respondents violated, and continue to violate, Section 203(a)(3)(B) of the CAA, 42 U.S.C. § 7522(a)(3)(B) by manufacturing, selling, offering to sell, and/or installing EGR, CV, and Aftertreatment Delete Hardware and ECM Defeat Tunes, intended for use with, or as part of, a motor vehicle or motor vehicle engine, where a principal effect of each Defeat Device is to bypass, defeat or render inoperative elements of design that control emissions, such as the EGR, CV, DOC, DPF, SCR, OBD systems and/or other elements of design on motor vehicles and motor vehicle engines that were in compliance with Title II of the CAA. WC Fab and WC Machining knew or should have known that such part or component was being offered for sale or installed for such use or put to such use.

Environmental Impact of Violations

29. These violations may result in excess emissions of PM, NO_x, hydrocarbons, and other air pollutants and contribute to increased ground level ozone concentrations. PM, especially fine particulates containing microscopic solids or liquid droplets, can get deep into the lungs and cause serious health problems, including decreased lung function; chronic bronchitis; and aggravated asthma. Additionally, current scientific evidence links short-term NO_x exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Exposure to ground-level ozone can also reduce lung function and inflame lung tissue; repeated exposure may permanently scar lung tissue.

Enforcement Authority

30. EPA may bring an enforcement action for these violations under its administrative authority or by referring this matter to the United States Department of Justice with a recommendation that a civil complaint be filed in federal district court. Any person who violates Section 203(a) of the CAA, 42 U.S.C. § 7522(a), is subject to an injunction under Section 204 of the CAA, 42 U.S.C. § 7523. Any person who violates Section 203(a)(3) of the CAA, 42 U.S.C. § 7522(a)(3), is subject to a civil penalty of up to \$4,876 for each violation. Section 205(a) of the CAA, 42 U.S.C. § 7524(a); 40 C.F.R. § 19.4, Table 1.

Harris,
Michael

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Michael
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Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Appendix A: Product List

Product Number	Product Description
664	11-15 GM Flo Pro 5" w/ muffler
864	11-15 GM Flo Pro 4" w/ muffler
7015	Ford SCT X4 Tuner
653NB	11+ 6.7L Ford Flo Pro 6.7 Ford Alum 4" w/ muffler
852NB	11+ 6.7L Ford Flo Pro Alum 4" w/ muffler
AC004DB	11-15 Jamo Alum 4" NO muffler
AC504DB	11-15 Jamo Alum 5" NO muffler
AC504DB-MD	11-15 Jamo Alum 5" NO muffler
AC506DBMD	2017+ L5P Duramax Jamo Exhaust 5" Aluminized without Muffler
C002DBMD	2001-10 Duramax 4" Jamo Stainless Steel Exhaust without Muffler
C004DB	11-15 Jamo SS 4" w/ muffler
C004DB-MD	11-15 Jamo SS 4" NO muffler
C504DB	11-15 Jamo SS 5" w/ muffler
C504DB-MD	11-15 Jamo SS 5" NO muffler
D004TB	07.5-09 6.7 Cummins Jamo SS 4" W/ Muffler
D005TB	10-12 6.7 Cummins Jamo SS 4" W/ Muffler
D006TB	13-17 6.7 Cummins Jamo SS 4" W/ Muffler
D006TB-MD	13-17 6.7 Cummins Jamo SS 4" NO Muffler
D505TB-MD	10-12 6.7 Cummins Jamo SS 5" NO Muffler

Product Number	Product Description
D506TB	13-17 6.7 Cummins Jamo SS 5" W/ Muffler
D506TB-MD	13-17 6.7 Cummins Jamo SS 5" NO Muffler
DEPK4152S	Diamond Eye 4" Down Pipe Back SS 409
EGR Kit - 6.7 Cummins	6.7 Cummins EGR Kit
EGR Kit - 6.7 Powerstroke	6.7 Powerstroke EGR Kit
F005DB	11+ 6.7L Ford Jamo SS 4" w/ muffler
F505DB	11+ 6.7L Ford Jamo SS 5" w/ muffler
FPECLNTBYPSCUMMINS- 6.7-SS	Fleece Performance Cummins Coolant Bypass Kit for 2007.5+ 6.7
MM3Cummins	6.7 Cummins Smarty MM3 Monitor with MotorOps Tuning
SS680	17-19 GM Flo Pro Exhaust Kit
SS680NM	17-19 GM Flo Pro Exhaust Kit
T424VANG	Steed Speed 24V T4 Angled Outlet 2nd Gen Exhaust Manifold
Tunes - Cummins CSP5	6.7 Cummins CSP5 Tunes with Switch
Tunes – Cummins Single	6.7 Cummins Single Tune
Tunes - Duramax Autocal 5 Tunes	11-16 LML Duramax Autocal w/ 5 Tunes
Tunes - Duramax DSP5	07.5-10 LMM Duramax DSP5 Tunes
Tunes - Duramax Single	11-16 LML Duramax Single Tune with License
Tunes - Duramax with Switch	11-16 LML Duramax Tunes with Switch
WCF100108	6.0 Powerstroke EGR KIT
WCF100151	2007-2018 6.7 Cummins Crank Case Breather Kit.

Product Number	Product Description
WCF100207	2011 LML Duramax PCV Reroute Kit. Use with basic Intercooler pipe. Includes block off plate for intake horn and hose with clamp
WCF100220	PCV Reroute Kit for 2012-2016 LML using basic Intercooler pipe. Includes Block off plates for intake horn and hose with clamp
WCF100305	3" Y-Bridge Kit for LBZ/LMM. For Competition Use only. Two piece 3" Y-Bridge and 3" cold side inter cooler pipe.
WCF100342	LB7 3.5" Turbo Intake Horn for IHI Charger.
WCF100356	LBZ/LMM Passenger Side 3" Intercooler pipe to be used with Factory Y-Bridge
WCF100357	3" Cross over pipe for LML for Competition Use Only. Bolts to factory Y-Bridge and connects to Factory Cold side IC pipe. Eliminates the grid heater and intake valve. Includes Coolant Hose, Hardware, Y-bridge Block off plates and Powder Coating. Requires a PCV reroute kit and PCV Block off plate, sold separate.
WCF100375	2017-19 L5P Duramax Downpipe Kit with EGR Fix. For competition use only.
WCF100450	PCV Reroute Kit for 05-10 Duramax use with Y-bridge Kits, High Flow Bundle Kits, Twin Turbo or Single Kit. 5/8" Parker Hose and Clamps, Billet Aluminum Fittings for Valve Covers.
WCF100451	LML PCV Reroute hose and clamp for use with y-bridge kit, single or twin turbo kits. 3/4" hose connects to driver side valve cover port, vents to atmosphere
WCF100461	2017-18 L5P Duramax PCV Reroute Kit w/ intake horn cap. For competition use only.
WCF100470	2017-18 L5P Duramax 3 1/2" Intake Horn & PCV Reroute Kit. Includes Powder Coating. For Competition Use Only.
WCF100476	2007.5-2009 6.7 Cummins 2nd Gen Swap kit for S300 Turbo. Must be used with ATS 3 piece or Steed Speed 2nd Gen T4 Manifold (Turbo and manifold sold separate) For Competition use only. Kit Includes: 4" down pipe (mates to v-band on exhaust system) 4" Intake with dry air filter and outerwear cover, oil feed line fitting, #10 Stainless oil drain line assembly, hot side Inter cooler pipe with v-band connection at turbo INCLUDES welding of V-band flange, clamps, boots, heater hose and coolant fittings. Powder coat finish.
WCF100481	Install Kit for 2011-2016 LML S300 Turbo. Turbo Not Included. For Competition Use Only. Kit Includes 3" Fabricated Y-Bridge, Hot and Cold Side 3" Inter cooler Pipes, 3" Down pipe HX40 style at turbo and bottom flange mates to exhaust system flange, T4 Pedestal, 4" Intake with dry air filter with cover, Stainless Braided Oil Feed and Drain Lines with Fittings, Boots, Clamps, Hardware, Coolant Pipe Plug, And Powder Coating. Need to know what Brand/Model Turbo is being used if not purchased from WCF.
WCF100575	LML S400 Over Stock Twin Install Kit, no Turbo. For Competition Use Only.

Product Number	Product Description
WCF100590	2" Stainless Up Pipe Set for single turbo application with factory exhaust manifolds for 2001-16 Duramax
WCF100593	New GM LB7 Passenger Side Up Pipe with Gaskets
WCF100605	3" Y-Bridge Kit for LBZ/LMM. For competition use only.
WCF100606	3" Y-Bridge Kit for LLY
WCF100607	3" Y-Bridge Kit for LML
WCF100618	2013-2018 6.7 Cummins 2nd Gen Swap kit for S300 Turbo. Must be used with ATS 3 piece or Steed Speed 2nd Gen T4 Manifold (Turbo and manifold sold separate) For Competition Use Only. Kit Includes: 4" Down pipe (mates to v-band on exhaust system) 4" Intake with Dry Air Filter and outerwear cover, #6 Stainless oil feed line, #10 Stainless oil drain line assembly, Hot side Inter cooler pipe with v-band connection at turbo INCLUDES welding of V-band flange to turbo cover, clamps, boots, heater hose and coolant fittings. Powder coat finish.
WCF100624	17-18 L5P Duramax 2" Stainless Up Pipe Set for use with factory exhaust manifolds.
WCF100630	2017-19 L5P EGR KIT
WCF100636	LB7 Stage 2 4" Intake Kit with turbo inlet horn for factory turbo
WCF100637	LLY Stage 2 4" Intake Kit with 3 1/2" turbo Inlet horn for factory turbo
WCF100638	LBZ Stage 2 4" Intake Kit with turbo inlet horn for factory turbo
WCF100639	LMM Stage 2 4" Intake Kit with turbo inlet horn for factory turbo.
WCF100641	2015-2016 LML Duramax High Flow Intake Bundle Package
WCF100654	2" Stainless Passenger Side Up Pipe mates to factory exhaust manifold for 2001-2016 Duramax.
WCF100691	11-16 LML 3" Y-Bridge Kit with 1 Piece 4" Intake
WCF100693	LB7 3" Y-bridge Kit - Fabricated 3" Bridge and Cold side inter Cooler pipe for LB7 with a factory turbo
WCF100707	L5P 3 1/2" Intake Horn for Factory Turbo, Includes Powder Coating and hardware (No provision for OEM PCV line)

Product Number	Product Description
WCF100713	2004.5-2005 LLY Duramax High Flow Intake Bundle Package. 3" Y-Bridge, 3" Hot and Cold side Intercooler pipes, 3" Stainless Steel Down pipe, 4" Intake, 3 1/2" Intake Horn, Dry filter, Outerwear's Pre-Filter Cover, Boots and Clamps, Powder Coating. (PCV reroute & new or modified up pipe required)
WCF100714	2006-2007 LBZ Duramax High Flow Intake Bundle Package. 3" YBridge, 3" Hot and Cold side Intercooler pipes, 3" Stainless Steel Down pipe, 4" Intake, 3 1/2" Intake Horn, Dry filter, Outerwear's Pre-Filter Cover, Boots and Clamps, Powder Coating. (PCV reroute & new or modified up pipe required)
WCF100716	2011-2016 LML Duramax High Flow Intake Bundle Package. 3" Y-Bridge, 3" Hot and Cold side intercooler pipes, 3" Stainless Steel Down pipe, 4" (one piece) Intake, Dry filter, Outerwear's Pre-Filter Cover, Boots and Clamps, Powder Coating.
WCF100795	LML OEM Y-bridge Anodized Block off Plate with m8x25mm hardware
WCF100846	PCV Reroute Kit with intake horn plug for 2005-10 Duramax. Use with Y-bridge kits, basic IC pipes, and factory intake horn. 8' of 5/8" Parker hose and clamps, Billet aluminum fittings for valve covers, Billet plug for factory intake horn.
WCF100847	Modified Duramax factory passenger side up pipe with new GM gaskets. For Race Use Only.

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)

<https://www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu>

EPA's OSDBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)

<https://www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman> or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program

<https://nationalsbeap.org>

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage

<https://www.epa.gov/compliance>

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers

<https://www.complianceassistance.net>

EPA-sponsored Compliance Assistance Centers provide the information you need, in a way that helps make sense of environmental regulations. Each Center addresses real world issues faced by a specific industry or government sector. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

<https://www.epa.gov/agriculture>

Automotive Recycling

<http://www.ecarcenter.org>

Automotive Service and Repair

<https://ccar-greenlink.org/> or 1-888-GRN-LINK

Combustion—Boilers, Generators, Incinerators, Wood Heaters

<https://www.combustionportal.org/>

Construction

<http://www.cicacenter.org>

Education

<https://www.nacubo.org/>

Healthcare

<http://www.hercenter.org>

Local Government

<https://www.lgean.net/>

Oil/ Natural Gas Energy Extraction

<https://www.eciee.org/>

Paints and Coatings

<https://www.paintcenter.org/>

Ports

<https://www.portcompliance.org/>

Surface Finishing

<http://www.sterc.org/>

Transportation

<https://www.tercenter.org/>

U.S. Border Compliance and Import/Export Issues

<https://www.bordercenter.org/>

Veterinary Care

<https://www.vetca.org/>

EPA Hotlines and Clearinghouses

www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center

1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center

www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - <http://nrc.uscg.mil> or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/p2/pollution-prevention-resources#ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline

tsca-hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides

<https://www.epa.gov/reg-flex/small-entity-compliance-guides>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons

www.epa.gov/resources-small-businesses/epa-regional-office-small-business-liaisons

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators

www.envcap.org/statetools

The Locators provide state-specific information on regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

<https://nationalsbeap.org/states/list>

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal

<https://www.epa.gov/tribal>

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has several such policies that may apply to small businesses. More information is available at:

- **EPA's Small Business Compliance Policy**
- <https://www.epa.gov/compliance/small-business-compliance>
- **EPA's Audit Policy**
- www.epa.gov/compliance/epas-audit-policy

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a Small Business Administration (SBA) National Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the SBA's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, you can call the SBA National Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247), or submit a comment online at <https://www.sba.gov/about-sba/oversight-advocacy/office-national-ombudsman>.

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.